



Michigan Department of Environmental Quality

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Governor Jennifer M. Granholm  
Director Steven E. Chester

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**Annual Report of Voluntary Disclosure Submittals  
Made Pursuant to Part 148,  
Environmental Audit Privilege and Immunity,  
Natural Resources and Environmental Protection Act  
Public Act 451 of 1994, as Amended**

**Report Period: April 1, 2007 through March 31, 2008**

**AUTHORITY**

Section 14810(1) of the Natural Resources and Environmental Protection Act (NREPA), PA 451 of 1994, as amended, requires the Michigan Department of Environmental Quality to annually publish a report that summarizes, in general categories, the types of violations voluntarily disclosed under Part 148, Environmental Audit Privilege and Immunity, and the time projected to achieve compliance.

## **NOTICES OF INTENT TO CONDUCT AN ENVIRONMENTAL AUDIT**

	<u>4/1/07 Through 3/31/08</u>	<u>Total Through 3/31/08</u>
Notices of Intent Received	135	3,663
Types of Facilities Submitting Notices of Intent		
➤ Industrial/Business	135	3,660
➤ Municipal	0	3
Geographic Distribution of Facilities		
➤ Number of Counties	19	
➤ Notices Submitted By County		
Washtenaw	25	
Wayne	25	
Genesee	18	
Oakland	16	
Midland	11	
Ingham	9	
Macomb	9	
Bay	4	
Eaton	3	
Jackson	2	
Kent	2	
Monroe	2	
Ottawa	2	
Saginaw	2	
Berrien	1	
Kalkaska	1	
Lenawee	1	
Livingston	1	
St. Clair	1	



## **VOLUNTARY DISCLOSURES**

	<u>4/1/07 Through 3/31/08</u>	<u>Total Through 3/31/08</u>
Voluntary Disclosures Received	39	245
Types of Facilities Submitting Disclosures		
➤ Industrial/Business	39	244
➤ Municipal	0	1
Geographic Distribution of Facilities		
➤ Number of Counties	16	
➤ Voluntary Disclosures Submitted By County		
Midland	6	
Wayne	6	
Grand Traverse	4	
Manistee	3	
Bay	2	
Kalkaska	2	
Kent	2	
Macomb	2	
Oakland	2	
Oscoda	2	
Otsego	2	
Ottawa	2	
Crawford	1	
Livingston	1	
St. Clair	1	
Washtenaw	1	

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### Non-NREPA Disclosures Reported:

SPCCC (Federal)  
Sara Title III (EPCRA)  
Hazmat Training

**Table 1: Violations Disclosed, by Category**  
**April 1, 2007 through March 31, 2008**

NREPA PART & Violation Category	Time Needed to Gain Compliance				
	Compliant at Disclosure	1 to 2 Months After Disclosure	3 to 6 Months After Disclosure	7 to 9 Months After Disclosure	Over 9 Months After Disclosure
<b>Part 111, Hazardous Waste Management</b>					
Improper Storage	13				
Inspections	1				
Labeling	8				
Planning	4				
Record Keeping	35				
Reporting	2				
Rule Violation	9				
<b>Part 31, Water Resources Protection</b>					
Improper Storage	1				
Inspections	1				
No Permit		2			1
Planning	7				
Record Keeping	7				
Reporting	1	7			
Rule Violation	4				
<b>Part 55, Air Pollution Control</b>					
Employee Training	1				
Inspections	9				
No Permit	2		3		
Planning		2	2		
Record Keeping	49				
Reporting	14				
Rule Violation	20				
<b>Part 167, Used Oil Recycling</b>					
Labeling	1				
<b>Part 201, Environmental Remediation</b>					
Reporting		1			
Record Keeping	1				
<b>Part 211, Underground Storage Tank</b>					
Inspections	2				
<b>TOTAL</b>	<b>192</b>	<b>12</b>	<b>5</b>		<b>1</b>

**Examples or General Explanation of Violation Categories**

<b>Employee Training:</b>	Required employee training or update was not received
<b>Improper Storage:</b>	i.e. containers without lids or open containers with hazardous waste
<b>Inspections:</b>	Failure to perform a required inspection(s)
<b>Labeling:</b>	Improper label or dates missing; i.e. labeled "Used Oil" instead of "Waste Oil"
<b>Record Keeping:</b>	Failure to appropriately maintain self-retained records
<b>Reporting:</b>	Improper reporting of records sent to DEQ
<b>Planning:</b>	Failure to develop, review or update a required plan
<b>No Permit:</b>	Failure to obtain a required permit or license
<b>Rule Violation:</b>	Most general; i.e. shipment did not get to disposal site within required timeframe; exceeded generator status